

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 1:25-CV-22324-WPD

HARVEY JAMES GOMEZ FROMETA, an individual; FREDDY AMADO GOMEZ FROMETA, an individual; BELKIS PIERINA GOMEZ FROMETA, an individual; PIERINA ZULETA FROMETA, an individual; CAROLINA ZULETA FROMETA, an individual; LUIS ALEJANDRO ZULETA FROMETA, an individual; DINORAH MERCEDES FROMETA SENIOR, an individual; HAYDEE FROMETA BELLO, an individual; LUIS VICENTE FROMETA BELLO, an individual; LUIS MANUEL FROMETA PAREJA, an individual; BARBARA REGINA FROMETA GRILLO a.k.a. BARBARA REGINA FROMETA DE SIGISMONDI, an individual; TRINA MARGARITA FROMETA GRILLO, an individual; JOSE ANTONIO FROMETA GRILLO, an individual; ILEANA ALEJANDRINA FROMETA GRILLO, an individual; MAGDALENA FROMETA GRILLO, an individual,

Plaintiffs,

v.

ADRIAN FROMETA SUBERO, an individual; BILLO'S CARACAS BOYS LLC, a Florida limited liability company; TELMO PEREZ QUIROZ, an individual,

Defendants.

**DECLARATION OF SCOTT ALAN
BURROUGHS**

I, Scott Alan Burroughs, hereby declare from my personal knowledge as follows. I represent the Plaintiffs in this action. I submit this declaration in support of Plaintiffs' opposition to Defendant Billo's Caracas Boys LLC's motion to dismiss Plaintiff's complaint. I am above eighteen (18) years of age and am competent to give the testimony set forth below. Said testimony is given from my own personal knowledge. If called as a witness, I could and would competently testify as set forth below.

1. Attached hereto as **Exhibit A** is a true and correct copy of a certified translation of the decree of the Supreme Court of Justice of the Bolivarian Republic of Venezuela.
2. Attached hereto as **Exhibit B** is a true and correct copy of a certified translation of the Order of the Enforcement Court of Caracas.
3. Attached hereto as **Exhibit C** is a true and correct copy of Defendants' trademark registration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 13, 2025, in New York, New York.

Dated: November 14, 2025

Respectfully submitted,

By: /s/ Scott Alan Burroughs
Scott Alan Burroughs